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Attorneys for Defendant Erickson

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**CHAD LEROY ERICKSON,**

**Defendant.**

**Case No. 3:18-cr-00319-MO-6**

**DEFENDANT ERICKSON'S  
MOTION TO CONTINUE THE  
APRIL 13, 2020 TRIAL DATE AND  
WAIVER OF SPEEDY TRIAL  
RIGHTS**

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COMES NOW Defendant, Chad Leroy Erickson, by and through his CJA-appointed attorneys, Thomas K. Coan and Richard L. Wolf, and hereby moves this court for an Order, continuing the present trial date of April 13, 2020 for a period no less than 120 days to a date convenient to the court and the parties herein.

I have discussed the proposed continuance with Defendant Erickson, who is in custody. He agrees with the need for and consents to the requested continuance. I have also advised Defendant Erickson of his rights under the Speedy trial Act. He agrees that the period between the current and next scheduled trial date will be excluded from any Speedy Trial Act calculations.

The United States, by and through AUSA Leah Bolstad does not object to this Motion provided it is granted as to all remaining defendants set for trial and does not result in the severance of any defendant for trial.

Codefendant Kenneth Hause, by and through counsel Todd Bofferding, does not object to this Motion and has filed his own motion to continue the current trial date. Codefendant Joseph Folkerts, by and through his counsel Andrew Kohlmetz, does not object to this motion and has filed his own motion to continue the current trial date. Codefendant Ryan Negrinelli, by and through his counsel Dianna Gentry, does not object to this Motion. Codefendant Mark Dencklau, by and through his counsel Lisa Ludwig, objects to this Motion.

The grounds for this request are set out fully in the accompanying Declaration of Counsel filed herewith *ex parte* and under seal. Despite diligent efforts in preparing the case, the defense cannot be ready for trial as currently scheduled.

This is Defendant Erickson's first request for a continuance of trial in this matter.

Respectfully submitted this 24<sup>th</sup> day of January 2020.

s/ Richard L. Wolf

Richard L. Wolf, OSB #873719  
Attorney for Defendant Erickson